

*** Filed ***
11:15 PM, 08 Jul, 2025
U.S.D.C., Eastern District of New York

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC) (JRC)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the attached Declaration of Carlos Roa., dated July 8, 2025, and upon the accompanying Memorandum of Law, non-party and Pro Se former Third-Party Defendant and Counter Claimant will move this Court at the Courthouse located at 225 Cadman Plaza East, Brooklyn, New York 11021, at a date and time to be determined by the Court, for an Order declaring Defendants Safa Abdulrahman Gelardi and Vito Gelardi as vexatious litigants and an injunction from filing any further frivolous motions and submissions without leave of court.

Dated: New York, New York
July 8, 2025,

Carlos Roa
Pro Se former Third-Party Defendant
and Counter Claimant
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